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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF JAMES JUDAH IN
24 SUPPORT OF PLAINTIFF WAYMO
25 LLC'S ADMINISTRATIVE MOTION TO
26 FILE UNDER SEAL PORTIONS OF ITS
27 MOTION FOR A PRELIMINARY
28 INJUNCTION, SUPPORTING
DECLARATIONS, AND SUPPORTING
EXHIBITS THERETO**

29 Defendants.

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1 I, James Judah, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Motion for a Preliminary Injunction, Supporting Declarations, and Supporting
 8 Exhibits Thereto (the “Administrative Motion”). The Administrative Motion seeks an order sealing
 9 the following materials:

Document	Portions to Be Filed Under Seal
Waymo’s Motion for a Preliminary Injunction	Highlighted Portions
Declaration of Jordan Jaffe (“Jaffe Decl.”)	Highlighted Portions
Waymo’s Identification of Trade Secrets, and attachments thereto (Exs. 1-21 to the Jaffe Decl.)	Entire Documents
Declaration of Gary Brown	Highlighted Portions
Declaration of Michael Janosko	Entire Document
Declaration of Tim Willis (“Willis Decl.”)	Highlighted Portions
Exhibits to Willis Decl.	Entire Document
Declaration of Pierre-Yves Droz (“Droz Decl.”)	Highlighted Portions
Exhibits to Droz Decl.	Entire Document
Declaration of Gregory Kintz (“Kintz Decl.”)	Highlighted Portions
Kintz Decl. Appendix B	Highlighted Portions
Declaration of William Grossman (“Grossman Decl.”)	Highlighted Portions
Exhibit to Grossman Decl.	Entire Document

26 3. Waymo’s Motion for Preliminary Injunction, declarations in support thereof, and
 27 exhibits thereto (collectively “PI Motion”), Motion for Expedited Discovery, and Proposed Order
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1 granting Waymo's Motion for Expedited Discovery contain trade secret and confidential business
 2 information, which Waymo seeks to seal.

3 4. Waymo's Motion for Preliminary Injunction, Waymo's Identification of Trade Secrets
 4 and attachments thereto, Droz Decl. and attachments thereto, and the Kintz Decl. each contain,
 5 reference, and/or describe Waymo's asserted trade secrets. The information Waymo seeks to seal
 6 includes the confidential design and functionality of Waymo's proprietary autonomous vehicle
 7 system, which Waymo maintains as secret. I understand that these trade secrets are maintained as
 8 secret by Waymo (Janosko Decl.) and are valuable as trade secrets to Waymo's business (Droz Decl.).
 9 The public disclosure of this information would give Waymo's competitors access to in-depth
 10 descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such
 11 information were made public, I understand that Waymo's competitive standing would be
 12 significantly harmed.

13 5. Waymo's Motion for Preliminary Injunction, the Declaration of Gary Brown, the
 14 Declaration of Pierre-Yves Droz, the Declaration of Michael Janosko, the Declaration of Tim Willis,
 15 and the Kintz Decl. and Appendix B thereto further contain, reference, or describe Waymo's highly
 16 confidential and sensitive business information. Such information includes detailed analysis of
 17 Waymo's security measures and protocols, detailed computer forensics regarding access to Waymo's
 18 trade secrets, and information on Waymo's supply chain (and agreements with its suppliers). This
 19 information also includes non-public organizational and operational details, such as the number of
 20 employees assigned to work on Waymo's LiDAR team. I understand that Waymo maintains that this
 21 information as confidential. The public disclosure of this information would cause significant
 22 competitive harm to Waymo, as its security measures, confidential business information, and trade
 23 secrets would become known to competitors who could use such information to Waymo's
 24 disadvantage.

25 6. Waymo's request to seal is narrowly tailored to those portions of the PI Motion that
 26 merit sealing.
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on March 10,
3 2017.

4 By /s/ James Judah

5 James Judah

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8 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from James Judah.

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12 /s/ Charles K. Verhoeven

13 Charles K. Verhoeven

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